

EXHIBIT 7

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DECLARATION OF WASHOE COUNTY LIBRARY BRANCH MANAGER

JONNICA BOWEN

IN SUPPORT OF DEFENDANTS' MOTION FOR PROTECTIVE ORDER

STATE OF NEVADA

COUNTY OF WASHOE

I, Jonnica Bowen do hereby declare, under penalty of perjury, the following:

1. I am a Washoe County Library System Branch Manager for the North Valleys Library in Reno, Nevada. I am one of the named defendants in *Ribar v. Washoe County, NV, et al.*, District of Nevada case number 3:24-cv-0052-ART-CSD. I am being represented by the Washoe County District Attorney's Office.

2. Plaintiff Drew Ribar ("Mr. Ribar") has filmed library staff, including myself, claiming to be a "First Amendment Auditor."

3. On June 15, 2024, Mr. Ribar was suspended for one (1) year from all Washoe County library branches. Following the denial of Mr. Ribar's second appeal of this suspension to the Washoe County Library Director, Mr. Ribar validly appealed his one-year suspension to the Washoe County Library Board of Trustees for its third and final review.

4. On August 21, 2024, I was present at the Washoe County Library Board of Trustees meeting. I was agendized to speak on Mr. Ribar's one-year library suspension at this meeting. My statements at this meeting addressed the circumstances surrounding Mr. Ribar's suspension and his subsequent conduct in attempting to defame and harass me online, mainly using his personal YouTube channel, Auditing Reno 911. Mr. Ribar was present at this meeting and personally recorded the meeting to later publish on his YouTube channel.

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1 5. On August 24, 2024, Mr. Ribar uploaded edited video footage of this meeting to his
2 YouTube channel entitled "Lying Crying Government Employee Caught."¹ This video
3 highlighted my testimony in front of the Board, naming me specifically with text on the
4 video, and attaching a question to his viewers: "Should lying government employees keep
5 their tax payer funded jobs??" This video has been viewed over 14,000 times and has over
6 150 public comments.

7 6. On September 1, 2024, Mr. Ribar posted a compilation video to his YouTube
8 channel entitled "Violent 1A Audit at Library 365 Day Suspension on Trial."² This video
9 includes footage from the August 21, 2024, Washoe County Library Board of Trustees
10 meeting and instructs his viewers via text on-screen: "To file HR complaint against lying
11 government employees copy and paste text from description and email to
12 dsolaro@washoecounty.gov" [Assistant County Manager Dave Solaro]. The description of
13 this video contains the following script to be sent to Mr. Dave Solaro: "Mr. Solaro, This is
14 a human resources complaint against Washoe County Library Director Jeff Scott, Assistant
15 Library Director Stacy McKenzie and Library Manager Jonica Bowen, all named
16 individuals have violated the Washoe County Code of Conduct. The named individuals
17 have violated the "Honesty", "Respect", Duty to Serve the Public", Tolerance", Fairness"
18 and "Courtesy" sections of the written policy. The violations can be viewed in the following
19 videos. [Four linked videos from Mr. Ribar's Auditing Reno 911 YouTube channel]."

20 7. Following a now-removed YouTube video's call to action for Mr. Ribar's viewers to
21 "spot the government lies" for \$100.00,³ I arrived to work to discover my inbox flooded
22 with emails from the general public. The majority of these emails referred in some way to
23 Mr. Ribar's video content. These emails were emotionally painful to me and caused me
24 severe distress in attending to my daily work duties.

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26 ¹ https://www.youtube.com/watch?v=7-NNy9zjQ_Q

² <https://www.youtube.com/watch?v=AGCA332kXp4>

1 8. Contained in these emails were assertions that I was a Nazi, a fascist, a pervert, a
2 tyrant, and a groomer, among many other damaging and emotionally upsetting terms.
3 These allegations and assertions are damaging to me as a professional in my specific line of
4 work, are deeply alarming, and cause intense emotional strain to me affecting my
5 interpersonal relationships. Another email threatened to hold me “to the whipping post and
6 [be] punished accordingly,” which made me fear for my personal safety.

7 9. On August 29, 2024, I received an unsolicited voicemail from a person aggressively
8 stating that I was a member of the “fascist Nazis of America,” that I had no choice, that I
9 owed money, that I had to “pay up,” they would “put a lien on [my] property,” that I
10 joined the Nazis “the moment that [i] started pulling [my] BS with the library,” that I
11 would be on the front page of a newsletter for pedophiles looking to hire “groomers” “just
12 in case they want to hire [me]... to groom their children,” that they would be sending
13 “randomly sending people in,” that I could move to Russia, North Korea, or Cuba, and
14 that caller assumed I was a “gay American female” and therefore those countries would
15 “put [me] in jail and kill [me].”

16 10. Following the unsolicited harassing contact, I took time off work to seek mental
17 health care.

18 11. I rely on my professional reputation to advance in my industry. My online presence
19 as an information professional is essential for my professional success, and Mr. Ribar’s
20 attempts to defame and harass me have caused me severe stress regarding the future of my
21 professional career. As a public servant involved in serving the community, including
22 children, being inaccurately called a “pervert” and “groomer” is especially distressing and
23 damaging.

24 12. I experienced humiliation having to discuss my interactions with Mr. Ribar and the
25 ensuing emails and harassment with my husband and family. I was unable to sleep at night
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³ YouTube itself appears to have later removed this video.

1 for fear of myself and my family's safety, as well as the overwhelming stress I was under
2 due to the concerning, harassing, and threatening emails I was receiving.

3 13. I have expended personal funds to retain the services of an online deletion platform
4 attempting to mitigate the risk to myself and my family due to the fallout from Mr. Ribar's
5 posting of his YouTube videos.

6 14. I began taking medication to help me to sleep at night and resorted to medical
7 support to begin working again. I was afraid to report back to my library branch for work
8 and ultimately decided to take a few more days off to compose myself after receiving the
9 harassing contacts in August 2024.

10 15. When in public, I no longer mention that my work involves the library due to the
11 fear of retaliation by Mr. Ribar and his supporters. I fear Mr. Ribar will continue to target
12 me in his online content with unwarranted accusations and misleading edited videos.

13 16. This fear was confirmed at the October 16, 2024, Washoe County Library Board of
14 Trustees meeting in which Mr. Ribar pointed at me in the audience and specifically asked
15 me whether I "enjoyed" his videos of myself. Following this meeting, at subsequent
16 Library Board meetings, Mr. Ribar has continued to refer to me as the "lying librarian" or
17 "lying, crying librarian."⁴ These antagonistic comments affect me on both a personal and
18 professional level.

19 17. Attached as an exhibit to Defendants' Motion for Protective Order, documents
20 bates stamped WC0949-WC0973, are true and correct copies of emails that I received
21 between August 22, 2024, to September 3, 2024, following the Washoe County Library
22 Board of Trustees' meeting held on August 21, 2024, in which Mr. Ribar's one-year library
23 suspension was upheld on appeal. These emails were pulled directly from my personal
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26 ⁴ See <https://youtu.be/hNHY8A-6JYA?feature=shared&t=11787>

1 Washoe County employee email account and constructed as a single document using PDF
2 conversion.

3 18. Most recently, on February 19, 2025, I was required to attend the Library Board of
4 Trustees Meeting where Mr. Ribar was present. During one public comment to the Board,
5 Mr. Ribar exclaimed, "FUCK OFF," stating that "I get to say whatever words I want...
6 Freedom of Speech."⁵ In other public comment, Mr. Ribar raised his voice saying he was
7 "pissed off," referring to staff and/or the Board as "liars," and that their inclusivity was
8 "bullshit."⁶

9 19. My experience in dealing with Mr. Ribar and my depiction in his social media
10 videos continues to be emotionally painful. I do not wish to be subjected to additional or
11 prolonged harassment based on his publication of compelled discovery, including but not
12 limited to potential deposition video of me.

13 20. I am attending a deposition in this case only because I must. I am fearful of being in
14 the same room as Mr. Ribar. I am anxious about his unpredictable outbursts and fearful of
15 being subjected to harassing questioning or yelling. I worry that he will antagonize me to
16 get a reaction on video and then post video clips of the reaction on social media to
17 embarrass me. I am also fearful of nonconsensual filming that results in misleading and
18 oppressive videos of me and invites others to engage in unsolicited contact with me or
19 about me.

20 I declare under penalty of perjury that the foregoing is true and correct.

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22 
23 JONNICA BOWEN
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26 ⁵ <https://youtu.be/C-sl1HHoG9I?feature=shared&t=5562>

⁶ <https://youtu.be/C-sl1HHoG9I?feature=shared&t=9361>